



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 10, 2025

BY ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: New York Times Co., et al. v. U.S. Department of Justice, National Security Division, et al., No. 24 Civ. 5982 (ER)

Dear Judge Ramos:

This Office represents Defendants U.S. Department of Justice, National Security Division (“NSD”), Federal Bureau of Investigation (“FBI”), National Security Agency (“NSA”), and Office of the Director of National Intelligence (“ODNI”) (the “Government”) in the above-referenced case. I write on behalf of all parties pursuant to the Court’s order at the initial conference held on November 12, 2024, that the parties submit joint status reports every 45 days.

As explained in the parties’ last status report, Dkt. No. 26, three of the four defendant agencies have, in the Government’s view, completed their response to Plaintiffs’ requests. Specifically, ODNI and FBI performed searches that did not reveal any responsive records, and NSA performed a search and provided the responsive documents that were identified to Plaintiffs on August 21, 2024. (Plaintiffs reserve the right to challenge the adequacy of ODNI and FBI’s searches and the redactions in records produced by NSA.) The remaining defendant, NSD, has conducted a search and identified approximately thirteen records, including classified records, that appear responsive. As noted in the last status report, because those records contain information of interest to other federal organizations, NSD is consulting with three other organizations regarding the records. NSD has asked these organizations how long each expects the consultations to take. One organization expects to be done by the end of April, while the other two organizations have acknowledged that the parties are in litigation but have not offered a timeline. NSD will seek another update from these organizations before the parties’ next status report if the consultations are not completed by then.

The parties will submit their next status report in 45 days—by May 27, 2025.

The Honorable Edgardo Ramos
Page 2

Respectfully submitted,

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cc: All counsel of record (via ECF)